

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANNEY MONTGOMERY SCOTT LLC,

Plaintiff,

-against-

FRANK GREENBERG, KAREL
GREENBERG, MARK LICHTER, and
KATHERINE LICHTER,

Defendants.
-----X

Civ. Action No.:

DECLARATION OF LANI A. ADLER

I, Lani A. Adler, hereby declare pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am admitted to the Bar of this Court and am a member of the law firm of K&L Gates LLP, attorneys for Janney Montgomery Scott LLC (“Janney”) in this action.

2. Attached as Exhibit A hereto is a true and correct copy of the Amended Statement of Claim, dated on or about March 18, 2010, with annexed exhibits, which Claimants Frank Greenberg, Karel Greenberg, Mark Lichter and Katherine Lichter, the defendants in this action, filed in FINRA Dispute Resolution Arbitration Number 10-00256, *Frank Greenberg and Karel Greenberg, Mark Lichter and Katherine Lichter v. Wachovia Securities, LLC, Wachovia Securities Financial Network, LLC, Morgan Keegan & Co., Inc., Janney Montgomery Scott, LLC, Robert William Eddy, and Robert D. Gooch, III*.

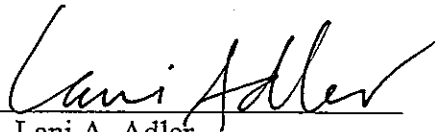
3. Attached as Exhibit B hereto is a true and correct copy of the Complaint filed in *Kurt Sollberger v. Wachovia Securities, LLC et al.*, No. SACV-09-0766 (AG) (ANx) (the “California Litigation”) on July 6, 2009 in the Central District of California.

4. Attached as Exhibit C hereto is a true and correct copy of the Order Granting Motions to Dismiss the California Litigation, signed by Judge Andrew J. Guilford on February 22, 2010.

5. Attached as Exhibit D hereto is a true and correct copy of the First Amended Complaint filed in the California Litigation on March 16, 2010.

6. Attached as Exhibit E hereto is a true and correct copy of the [Tentative] Order Granting Motions to Dismiss the First Amended Complaint and Denying Motion to Amend in the California Litigation dated May 24, 2010.

Executed on May 26, 2010



Lani A. Adler